

EXHIBIT 1

JESSE SBAIH & ASSOCIATES, LTD.
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Former Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PARNELL COLVIN,

Plaintiff,

vs.

M.J. DEAN CONSTRUCTION, INC.;
DOES I through X; AND ROE
CORPORATIONS XI-XX, INCLUSIVE,
inclusive;

Defendant.

Case No.: 2:20-cv-01765-APG-EJY

**DECLARATION OF INES OLEVIC-SALEH,
ESQ. IN SUPPORT OF REPLY IN SUPPORT
OF JESSE SBAIH & ASSOCIATES, LTD.'S
MOTION TO ADJUDICATE ATTORNEY'S
LIEN AND REDUCE LIEN TO JUDGMENT
AGAINST PLAINTIFF PARNELL COLVIN**

Ines Olevic-Saleh, Esq., being first duly sworn, deposes and says:

1. I am over the age of eighteen years old and I am a resident of Clark County, Nevada.

2. I am a partner at JESSE SBAIH & ASSOCIATES, LTD., ("JSA"), former attorneys for the Plaintiff Parnell Colvin in the above-entitled action. I have personal knowledge of the matters stated herein and could testify competently to them if called upon to do so.

3. I attained bachelor degrees in International Business and Managerial Finance, with honors, from UNLV Lee Business School and a Juris Doctor degree from William S. Boyd School of Law. I have been a practicing attorney in Nevada over twelve (12) years, and at all times have been in good standing with the Nevada State Bar.

4. Since becoming an attorney, I have successfully represented numerous clients and obtained many favorable results. As a partner at JSA, I practice in various areas of law, with emphasis on personal injury, employment law, breach of contract, insurance bad faith, wrongful

death, and medical malpractice. Presently, my hourly billing rate for employment matters is \$400.00/hour, which is commensurate with the rate other attorneys similarly situated bill for such legal services.

5. Below is a list of major tasks JSA performed on behalf of Mr. Colvin and conservatively calculated time spent on them, totaling an amount of \$12,640.00. It should be noted that not listed below are numerous meetings (subsequent to the initial one), phone calls and emails (approximately over forty (40)), exchanged with Mr. Colvin, and opposing counsel, during JSA's representation. Also, below listing does not include any of tasks performed by JSA's clerical staff, nor the attorney time spent reviewing those tasks.

TASK	HOURS	AMOUNT
Initial meeting with Mr. Colvin, review of documents provided by Mr. Colvin, draft detailed 8 page Demand to M.J. Dean on behalf of Mr. Colvin, and subsequent negotiations with M.J. Dean.	6.5	\$2,600.00
Draft 11 page Complaint alleging seven (7) distinct causes of action.	3.5	\$1,400.00
Attend FRCP 26(f) conference with opposing counsel and draft a proposed Discovery Plan.	1.0	\$400.00
Receive, review and analyze Defendant's initial disclosures and a supplement.	1.0	\$400.00
Draft Plaintiff's initial and supplemental disclosures.	1.0	\$400.00
Draft 13 page Opposition to Motion to Dismiss and Countermotion for Leave to Amend the Complaint.	5.0	\$2,000.00
Draft Reply in Support of Countermotion to Amend Complaint.	2.0	\$800.00
Draft ENE Statement and attend the ENE session.	4.5	\$1,800.00
Draft Interrogatories, Requests for Admissions, and Requests for Production of Documents for the Defendant.	5.1	\$2,040.00

Draft 9 page Opposition to Defendant's May 21, 2021 Motion to Dismiss First Amended Complaint	2	\$800.00
TOTAL		\$12,640.00

6. All of the work performed by JSA on behalf of Mr. Colvin was performed to the highest legal and ethical standards.

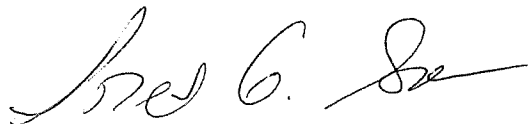
7. At the inception of the matter, Defendant M.J. Dean refused to pay Mr. Colvin any compensation. As a result of the efforts of JSA, Mr. Colvin received an offer in the amount of \$25,000.00 to resolve his matter. Moreover, as a result of the work of JSA, M.J. Dean's Motions to Dismiss were denied in relevant parts. Finally, Mr. Colvin's case resolved with settlement to the benefit of Mr. Colvin partially because of the groundwork and posture of the case laid by JSA.

8. During JSA's representation of Mr. Colvin, JSA incurred the costs outlined below totaling \$470.00. The supporting receipts for the costs are collectively attached as *Exhibit 2* to JSA's Reply in Support of JSA's Motion to Adjudicate Attorney's Lien and Reduce Lien to Judgment against Plaintiff Parnell Colvin.

Date	Document	Cost
9/23/20	September filing fees/complaint	\$400.00
10/2/20	Special delivery fee/Legal Wings	\$25.00
11/13/20	Process Service fee on Defendant/Legal Wings	\$45.00
	TOTAL	\$470.00

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED this 27th day of July, 2023



Ines Olevic-Saleh, Esq.